

**JONATHAN RICE**

Attorney At Law

MEMO ENDORSED

BY FAX: 914-390-4095

July 17, 2008

Hon. Judge George A. Yanthis  
 United States Magistrate Judge  
 United States District Court  
 Southern District of New York  
 300 Quarropas St., Room 118  
 White Plains, NY 10601

Re: John A. Bellantoni, et ano. v. General Motors Corporation, et ano.  
 U.S. District Court/Southern District of New York  
 Case Number: 08 CV 240 (CLB)

Dear Hon. Judge Yanthis:

As per the instructions of the court, I enclose herewith a Proposed Protective Order in this case. I believe the amendments proposed more appropriately require GM to establish that a document is confidential and entitled to protected status. Additionally, I believe that the public interest is protected by reason of the other amendments permitting disclosure to governmental agencies such as the Consumer Product Safety Commission.

I thank the court for its courtesy and attention to this matter.

Sincerely yours,

  
 JONATHAN RICE

JR/fg

cc: Robyn M. Gnudi, Esq.  
 Brian K. Telfair, Esq.

Counsel are directed to confer within next seven (7) days and make good faith effort to reach agreement concerning proposed protective order. If unable to reach agreement, counsel are to send letters to chambers stating why their version of proposed order should be accepted within 15 days. So ordered.  
 Gene A. Faltus USMT  
 7/24/08